

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF
TRANSPORTATION, et al.,

Defendants.

Civil Action No.
25-cv-000208-JJM-PAS

JOINT MOTION FOR EXPEDITED BRIEFING SCHEDULE

In an effort to efficiently resolve this case, the parties have conferred and agreed to proceed with cross-motions for summary judgment on a schedule that would allow for the expeditious resolution of this case. To that end, the parties propose the following briefing schedule for cross-motions for summary judgment:

- **August 19, 2025:** Plaintiffs will file their motion for summary judgment and Defendants will file their cross-motion for summary judgment.
- **September 24, 2025:** Defendants will file their opposition and reply to Plaintiffs' motion for summary judgment and Plaintiffs will file their opposition and reply to Defendants' cross-motion for summary judgment.

Because no discovery is expected in the case, the disputed issues are largely legal in nature, and all relevant factual issues will be fully addressed in the parties' summary judgment briefs and exhibits attached thereto, the parties further request that the Court waive the requirement that the parties submit Statements of Undisputed Facts and responses thereto pursuant to Local Civ. R. 56(a). At this

time, Defendants believe that there is no further administrative record to produce apart from documents previously filed with the Court in this action or disclosed to Plaintiffs. Defendants expect to promptly notify the Plaintiffs if they identify any additional records that should be included in the administrative record.

Defendants also request, with Plaintiffs' consent, that the Court waive the requirement that Defendants file an answer to the amended complaint, given that the parties will be proceeding straight to summary judgment briefing.

Dated: July 24, 2025

U.S. DEPARTMENT OF
TRANSPORTATION, et al

By their Attorneys,

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CERTIFICATION OF SERVICE

I hereby certify that, on July 24, 2025, I filed the foregoing document through this Court's Electronic Case Filing (ECF) system, thereby serving it upon all registered users in accordance with Federal Rule of Civil Procedure 5(b)(2)(E) and Local Rules Gen 304.

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